

State Coastal Conservancy Budget Guidelines for Indirect Costs or Overhead

Nonprofit organizations, public agencies, and academic institutions receiving grant funds from the Coastal Conservancy are required (in the grant agreement) to meet strict accounting standards. Entities that fail to do so may be liable for repayment of funds. It is the responsibility of the grantee to ensure that their accounting practices are adequate, in accordance with the guidelines of "Generally Accepted Accounting Principles" ("GAAP") published by the American Institute of Certified Public Accountants. All Conservancy grantees should expect to be audited by the State.

The purpose of this document is to provide general guidance for grantees on how to develop a budget for a Coastal Conservancy grant. As part of its grant making process, the Coastal Conservancy requires a detailed budget and workplan. It is the responsibility of the grantee to be sure that the budget and all subsequent billings are justified and documented appropriately. Each grantee is encouraged to solicit its own accounting advice and conduct an audit to ensure that its practices are correct. Below is explanation of various types of costs that can be billed to Conservancy grants.

DIRECT COSTS

Labor Costs

Project Implementation – The grantee's employee labor implementing a project will be reimbursed at rates equal to compensation actually provided to the employee (salary plus benefits, including fringe benefits). The cost of a grantee's labor/staff time to implement specific project tasks (for example, prepare a management plan, determine trail alignments) should be included in and billed to specific tasks in the budget.

Project Management - A work program may include a task called "Project Management" (please use this term). This task should cover <u>labor</u> costs, not otherwise billed, that are associated with administering a specific Conservancy grant (for example, managing contracts, paying consultants, billing SCC, maintaining accounting records, and other time spent on managing the project).

Other Direct Costs

Direct costs should be billed at cost.

Project Supplies and Services - Project-specific supplies and services (for example, printing, copying, long-distance calls, publications, maps, technical surveys, pre-fabricated bridge structures, bicycle racks, benches) may be billed to the grant if these costs appear in the approved work plan and budget. Receipts (original or scanned) or other documentation will be required. Generally, Conservancy funds may not be used to purchase equipment, such as furniture, computers, phones, etc. If a piece of equipment is directly related to carrying out a grant's purposes, it may be purchased as a grant expense. **Check with your Conservancy project manager before you purchase** any equipment to ensure that it is appropriate under the grant agreement.

Personal Equipment

Personal equipment such as rubber boots and sunscreen may be approved as part of the work program. If the supplies outlast the grant term, the grantee shall commit to using the supplies to support project purposes for the useful life of the supplies.

Food

If a grant is funded with bond funds, the Conservancy will not pay for food other than approved travel expenses (see below). If a grant is *not bond-funded* and food *is essential* to the success of the project, it is an allowable direct expense. Examples of projects where it would be appropriate to approve food purchase would include an Explore the Coast grant where the project takes children on an all day field trip and provides the participants with lunch.

Travel

Essential project-related travel expenses will be reimbursed at cost up to the limits allowed by the State's <u>Travel Guidelines</u>. The budget should describe the necessary trips and travel costs within this category. The State's Travel Guidelines have strict limits on reimbursement for mileage, hotels, and meals among other costs. Grantees must review these guidelines and use the state's travel reimbursement form when billing for travel costs. Receipts will be required. Grantees (and their contractors) may be reimbursed for use/rental of special equipment (trucks, boats, etc.) if it is needed for the project, included in the approved budget, and documented. Both In-State overnight travel and Out-of-State travel must be pre-approved by the Conservancy.

Training

The Conservancy can pay for trainings or conferences that clearly support successful implementation of a project and are clearly identified in the Work Program. These should be a separate line item on the approved budget.

Contractors and Subcontractors

Contractors to a nonprofit (and their subs) must be approved as part of the workplan and budget. Invoices from contractors should be included as backup documentation in grantee invoices and the invoice must either have the contractor's letterhead or a signature. For-profit contractors working for a nonprofit organization may include mark-ups in their billing as long as their rates and overall budget has been approved.

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OVERHEAD OR INDIRECT COSTS

Overhead or indirect costs are the non-project specific costs of doing business (for example, rent, computers, telephones, office supplies, internet access, copy machines, electricity). Certain types of indirect costs may NOT be charged to the Conservancy, including food and beverage, fundraising, lobbying and entertainment. Any cost that is billed as a direct cost may NOT be included in overhead.

"Overhead" and "indirect costs" are both acceptable terms that represent the same category of costs. If a grantee seeks to recover overhead costs from a Conservancy grant, overhead should be included as a line item in the approved project budget.

The Conservancy limits overhead recovery to a maximum of 20% of a grant.

Grantees that wish to charge overhead to a Conservancy grant must be able to document the appropriateness of these charges. One typical method for documentation is to have a Cost Allocation Plan for their organization. Other methods may be adequate, but it is the grantee's responsibility to determine this based on the guidelines of GAAP. It is recommended that grantees work with a CPA to develop an appropriate method for calculating their overhead rate and determining what overhead costs may be allocated to a grant. It is the responsibility of the grantee to maintain appropriate records for all overhead costs, and to be able to provide those records in the event of an audit.

If the Conservancy is granting funds to a federally recognized tribe that has an approved Federal Indirect Cost Rate, the Conservancy will pay that rate for to the tribe.

If the Conservancy is passing through federal grant funds to a grantee that has an approved Federal Indirect Cost Rate, the Conservancy will pay that rate with the federal funds. Grantees should provide a copy of the approved Federal Indirect Cost Rate with the work program.

HOW TO INVOICE THE CONSERVANCY

<u>Instructions</u> and the form for invoicing the Conservancy are posted on our <u>website</u>.

DEFINITIONS

<u>Fringe Benefits</u> are all employer paid benefits and include things like healthcare benefits, cafeteria plans, gym subsidies, transit reimbursement, and educational subsidies. The IRS definition of fringe benefits is here:

http://www.irs.gov/publications/p15b/ar02.html#en US 2013 publink1000193623.

<u>Overhead or indirect costs</u> are costs that cannot be readily and specifically identified with or attributed to a specific project and include costs of doing business (for example, rent, computers, telephones, office supplies, internet access, copy machines, electricity).

<u>Cost Allocation Plan</u> is a formal accounting plan used to calculate and document the method for recovering overhead costs.

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